Remarks

After filing a notice of appeal, applicants elected to reopen prosecution to point out a key feature that is not shown or suggested in the art of record. That feature is a continuous wobble groove with one segment for storing and erasing data and another segment for storing read only data. None of the prior art shows this feature.

The invention is directed toward recording systems for hybrid optical discs that have two parts: a RAM portion for storing and erasing information once or many times and a ROM portion for storing read only information that is not erased. A CD-ROM stores only non-erasable information and a user cannot write information to the CD-ROM. Its tracks are conventional spirals and have no wobble. In contrast, other CDs may be written to one or more times. Those writable CDs use a wobble track for addressing.

The prior art of record does not show or suggest a hybrid optical disc with a continuous wobble groove that has two segments, one for ROM and one for RAM.

Ogata '364 has one wobble track 19 for storing ROM information. RAM or read/write information is not carried in the groove 19. Instead, it is carried on the adjacent land 20. Thus, Ogata '364 does not put both the ROM and RAM data into a wobble groove. Only the ROM data of Ogata '364 is in the wobble groove.

Endoh '164 has two parallel grooves, one for holding ROM and one for holding RAM. See groves 111, 112 of Fig. 2 and col. 1, lines 44 – col. 2, line 7.

Auwens '518 is silent about any wobble groove and appears to be a CD-ROM and thus has only one ROM groove and no segment for writing and erasing.

Claim 18 is amended to change the expression "controller" to "logic circuits" and thereby remove any further objection to its wording.

Each independent claim has the feature of a wobble groove with ROM and RAM segments. That feature is not shown in the art of record. Accordingly,

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Applicants believe their application is patentable over the art of record and request a notice of allowance.

Respectfully submitted,

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